

Exhibit

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ILLINOIS POLICY INSTITUTE,

Plaintiff,

v.

ILLINOIS DEPARTMENT OF LABOR and
JANE R. FLANAGAN, *in her official
capacity as Director of the Illinois
Department of Labor,*

Defendants.

Case No.

**Declaration of Matthew Paprocki
in Support of Motion for
Preliminary Injunction**

I, Matt Paprocki, declare as follows:

1. I am a U.S. citizen over the age of 18 years. If called to testify, I would testify as follows:
2. I am President and CEO of the Illinois Policy Institute (“Institute”).
3. The Institute is a research organization that publishes policy research on a variety of political topics, including the state budget, jobs, labor, pensions, education, and criminal justice.
4. The Institute holds mandatory staff meetings every week for all staff, with no exceptions made for job title or position.
5. The Institute holds two all-staff retreats each year, and all staff, regardless of position, are required to attend.
6. The purpose of these meetings is to provide information on substantive policy issues as well as administrative matters to everyone, so that all staffers feel

connected to the mission and daily work of the organization and do not perceive that they work in isolated silos.

7. At the mandatory weekly meetings and mandatory retreats, the Institute has dedicated segments for discussing topics such as the Workers' Rights Amendment, the proposed real estate transfer tax in Chicago, and the Invest in Kids tax credit scholarships.

8. Departments at the Institute, including the research and publications department, the data and operations department and the communications department, also hold mandatory weekly or biweekly meetings. Policy and legislation-related matters related to topics such as state and local budgets, pensions, education policy, the economy and taxation, are often discussed at these meetings, despite the fact that not every person in these departments will be directly involved in work related to every policy discussed at every mandatory meeting.

9. It is important for the functioning of Institute to communicate about political matters—including discussions of any legislation that may be crafted by the General Assembly—with its employees and ensure that its employees listen to such communications. Often the most efficient way of doing so is by holding mandatory meetings.

10. Staff morale and team cohesion depend on every staff member knowing what the Institute's various teams and experts are working on. Furthermore, these meetings ensure staff who are not working on these matters have a chance to ask

questions about the issues so they can understand clearly what their colleagues are working on and what positions the Institute takes on specific policy matters.

Staffers who are not working on a specific policy-related matter will often have an interesting idea or a new perspective on how to approach an issue.

11. Team morale and connection to the organization, as well as idea generation, would all suffer if the Institute had to conduct staff meetings without providing policy-related information to all staff.

12. As a research and policy organization, the Institute's work must adapt and be responsive to political events, such as the passage of new laws and court rulings. As such, the institute's team must be able to continue discussing these political and policy matters freely at mandatory staff meetings and retreats in the future.

Under penalties as provided by law, I swear that the foregoing is true and correct.



Oct. 30, 2024

Matthew Paprocki